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Proposed Attorneys for Debtor and Debtor-in-Possession

**UNITED STATES BANKRUPTCY COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA, SAN DIEGO DIVISION**

In re

ELLIE LANE CAPITAL, LLC, dba  
Your SolarMate,

Debtor and Debtor-in-Possession.

Case No. 3:24-bk-2207-CL11

**Chapter 11**

**FIRST DAY MOTION:  
DECLARATION OF TELEPHONIC  
NOTICE RE MOTION FOR ORDER  
AUTHORIZING INTERIM USE OF  
CASH COLLATERAL TO JULY 31,  
2024**

[No Hearing Required Pursuant to LBR  
Appendix D1]

**DECLARATION OF VANESSA M. HABERBUSH**

I, VANESSA M. HABERBUSH, hereby declare and state:

1. I am an individual over the age of 18 years. I have personal knowledge of the facts stated herein and if I were called as a witness would and could competently testify thereto, under penalty of perjury.

2. I am a partner of Haberbush, LLP, proposed counsel for Ellie Lane Capital, LLC, dba Your SolarMate, Debtor and Debtor-in-Possession ("Debtor") in the above-captioned bankruptcy case.

3. On June 18, 2024, Debtor filed a First Day Motion Seeking an Order Authorizing the Use of Cash Collateral [docket number 3] (the "Motion") pursuant to LBR Appendix D2.

4. The below chart sets forth the interested parties that I personally gave notice to, as well as the phone number I called, the time I gave the notice, which included notice to all secured creditors, including the disputed secured creditors, and details regarding who I spoke to:

Interested Party	Phone Number <sup>1</sup>	Time Called <sup>2</sup>	Who I spoke to
Office of the United States Trustee	619-557-5013 (mail telephone number for the United States Trustee indicated on its website)	Between approximately 9:05 a.m. and 9:20 a.m.	I called the Office of the United States Trustee and no one answered the phone. Therefore, I left a voice message on the general mailbox informing them of the filing of the Motion and that it was being emailed to the general email address for the United States Trustee at <a href="mailto:ustp.region15sop@usdoj.gov">ustp.region15sop@usdoj.gov</a> . Also, because a trial attorney had not yet been assigned to the United States Trustee, I left a detailed message for each trial attorney (Haeji Hong, Corina Pandeli, and Elvina Rofael) with the same information. I had also called on June 17, 2024 in the late afternoon, but no one picked up and I did not leave a message.

<sup>1</sup> Unless otherwise indicated, all phone numbers were obtained from the Debtor's records for each party called.

<sup>2</sup> All times identified for calls in this declaration refer to June 18, 2024, unless otherwise noted.

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1 First Bank of 573-746-2785  
2 the Lake

Approximately  
9:40 a.m.

I spoke with Jason Rhee, the individual with whom Debtor communicates regarding this loan. I had communicated with him on June 17, 2024 about the possible bankruptcy and he was still in the process of locating an asset manager or other individual to manage this account. I confirmed that he had received a copy of the Motion. He did not have a position on the Motion at the time I called.

8 Advantage 504-648-8673  
9 Capital  
10 Investment  
11 Management, LLC

Approximately  
9:45 a.m.

I spoke with Paul Castedo, the individual with whom Debtor communicates regarding this loan. I had communicated with him on June 17, 2024 about the possible bankruptcy and he asked that I include Jerry Daigle, inside counsel, on communications. The email with the Motion had not been received by him, so I resent a copy of the Motion to him and Mr. Daigle and confirmed his receipt while on the phone. He did not have a position on the Motion at the time I called.

16 G C a l 714-772-7400  
17 Services,  
18 LLC dba  
19 Your  
20 SolarMate,  
21 G r e g  
22 Khatchatour  
23 ian, and Joy  
24 Khatchatour  
25 ian, through  
26 their counsel

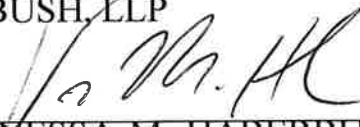
9:55 a.m.

I spoke with the reception for the Thakur Law Firm, who indicated that both of the attorneys covering this matter were unavailable. The receptionist took a message, with my name and phone number, and said I would receive a call back.

Respectfully submitted,

HABERBUSH, LLP

By,

  
VANESSA M. HABERBUSH, Proposed  
Attorneys for Debtor and Debtor-In-  
Possession

Date: June 18, 2024